



MURIEL GOODE-TRUFANT  
*Corporation Counsel*

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

JOHN SCHEMITSCH  
*Senior Counsel*  
Phone: (212) 356-35395  
Fax: (212) 356-3509  
jschemit@law.nyc.gov

February 28, 2025

**VIA ECF**

Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Naquan Cintron v. City of New York, et al., 24-cv-06602 (PAE)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendant City of New York in this matter. Defendant writes in response to plaintiff's letter, dated February 27, 2025. See ECF No. 14. Defendant agrees that the motion is now moot, as plaintiff has provided the required release. However, plaintiff's letter makes it appear as if defendants did not make proper requests for the required release. Defendant has been seeking this release for over two months, without progress. Defendant notes that the undersigned wrote to counsel for plaintiff on December 19, 2024, as is required by Local Rule 83.10, and plaintiff's attorney confirmed in writing that that a 160.50 release would be provided "ASAP." The undersigned followed up in writing on January 3, 2025, January 28, 2025, and February 7, 2025, without any response. Plaintiff did not provide the required releases in response to defendant's numerous requests, and it appears that plaintiff only provided the releases upon receipt of defendant's filed motion. Plaintiff only provided a release after Defendant filed a letter with the Court, and shortly before the Court's Order on February 25, 2025, over two months after counsel stated it would be provided "ASAP." See ECF No. 13.

Thank you for your consideration herein.

Respectfully submitted,

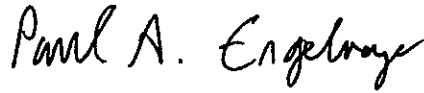
/s/

John Schemitsch  
*Senior Counsel*

cc: **VIA ECF**  
All Counsel of Record

The Court thanks counsel for this welcome update. The Court accordingly denies defendants' motion to compel as moot. *See* Dkt. 12. However, the Court notes, with dismay, the significant delay and duplication occasioned by plaintiff's belated production of the Section 160.50 release. *See* Local Rule 83.10(1)(a) ("*At the same time* that plaintiff serves the complaint, plaintiff must serve on the City the . . . § 160.50 Release[.]" (emphasis added)). It reminds plaintiff's counsel of its expectation that they will conduct this litigation professionally and respectfully.

SO ORDERED.

A handwritten signature in black ink, reading "Paul A. Engelmayer". The signature is written in a cursive, flowing style. The first name "Paul" is written with a large, prominent 'P'. The middle initial "A." is smaller and follows the first name. The last name "Engelmayer" is written in a continuous, cursive script.

---

PAUL A. ENGELMAYER  
United States District Judge

Dated: March 3, 2025  
New York, New York